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December 1, 2021

VIA ECF

Hon. Peggy Kuo
Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States of America v. Lax et al.
18-CV-4061 (ILG-PK)

Dear Judge Kuo:

I submit this letter to notify the Court of the limited scope of my representation in connection with my Notice of Appearance on behalf of defendant Moshe Lax filed this afternoon via ECF (Dkt # 268).

The Court directed Mr. Lax in the minute order dated November 4, 2021, to retain counsel regarding his assertion of his Fifth Amendment rights against incrimination at the Plaintiff's May 25, 2021 deposition of Mr. Lax. Mr. Lax has retained me for this purpose, as well as to respond to Plaintiff's Motion to Compel Deposition Testimony of Moshe Lax (Dkt # 252) including filing a copy of the deposition transcript specifying which questions Mr. Lax should not be compelled to answer, attend the December 3 status conference on behalf of Mr. Lax, and to attend the second *In Camera* Review scheduled for December 7. The scope of my representation extends to other yet unscheduled matters directly related to Mr. Lax's assertion of his Fifth Amendment rights not to answer Plaintiff's deposition questions but is not intended to be a general notice of appearance to represent Mr. Lax in this civil litigation.

Respectfully submitted,

s/s
Noah E. Shelanski